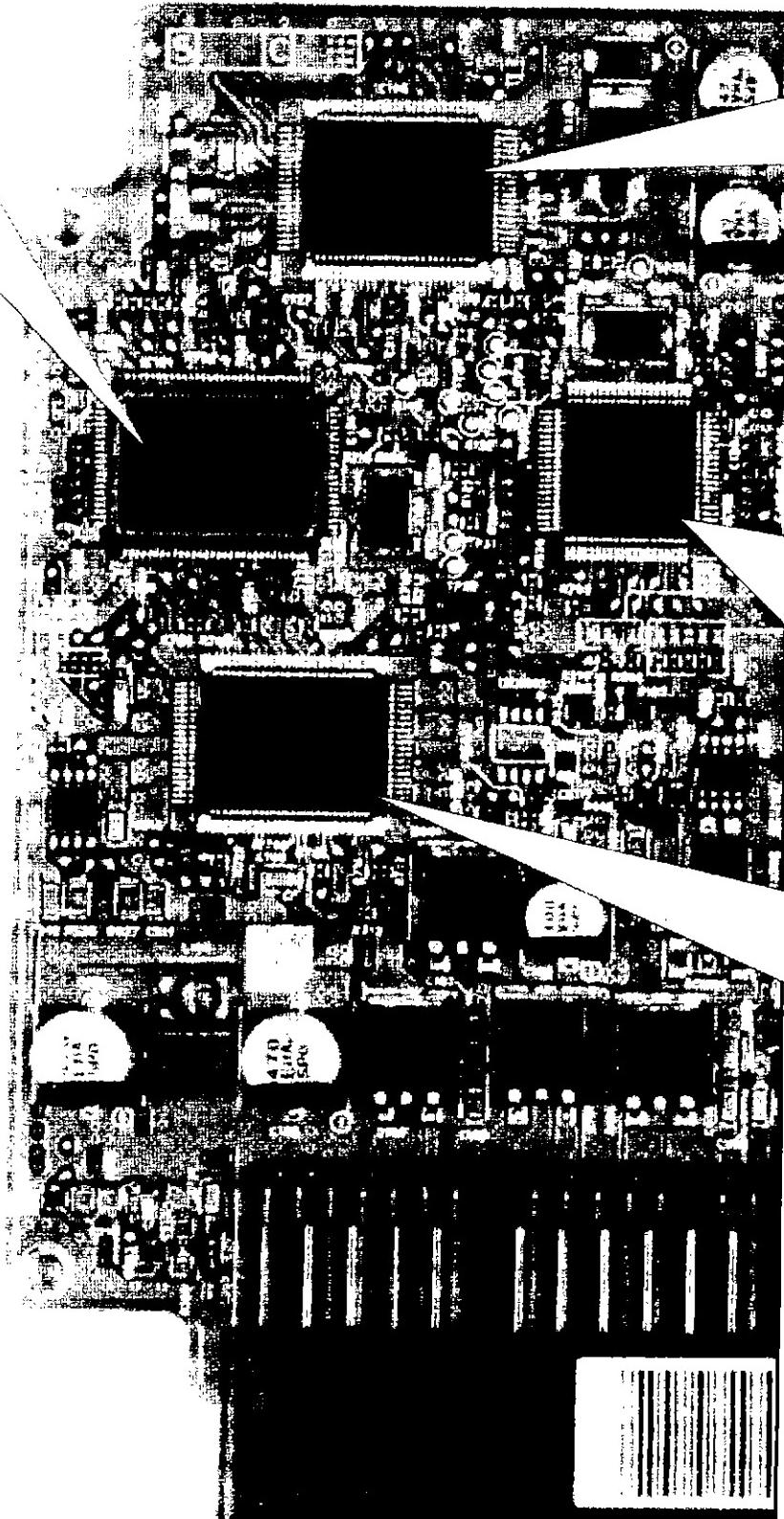


Toyota Prius: *Skid Control Module (SCM) Side 1*

Toshiba
#TMP1984FDFG
32-bit Microprocessor



Toyota
#DAO23
Power Control

Mitsubishi
#M30620
16-bit Microprocessor ('95!)

Toyota
#DAO34
Power Control/Driver

Airbag Control Module (ACM)





Summary: Airbag Control

As with the ABS and traction control discussed in the previous section, airbags have become a fixture of automobiles. Federally mandated in U.S. cars sold after April 1, 1989, airbags provide a valuable and effective supplemental restraint system when used in combination with your normal seat belts. For those who have experienced an airbag deployment, you know that it is a violent event and costly to replace, so great care is built into the design of the Airbag Control Module (ACM) to insure it goes off when it needs to but doesn't deploy in a minor fender-bender. We manually fired off the airbag at the live ESC Prius Teardown to demonstrate the drama of an airbag event and because, well let's be honest, engineers just like to see things blow up sometimes. After getting a whiff of gunpowder and feeling the heat generated in deployment, we set off on looking at the electronics.

The Prius airbag system varies in complexity depending on whether optional side-impact airbag curtains are ordered. In the case of the primary driver side airbag located in the steering wheel, the ACM detects whether a collision of sufficient magnitude for deployment has occurred and also varies the degree of deployment to compensate for seating position. Those pulled up close to the wheel will not see the degree of deployment as those positioned further back.

Analog components form the critical front-end for the ACM, with accelerometers being the primary impact detection sensors. Two MEMS-based accelerometers made by Denso of Japan (#7Q 32 and #8T J8) are surface-mounted directly to the ACM board. The two MEMS components are placed orthogonal to one another, one in the Y-axis for front collision detection and the other oriented in the X axis and presumed to correspond to side-impact events. The sensors themselves are housed in a metal-lidded ceramic package and composed of two chips stacked on top of one another. The MEMS element appears to be a micromachined strain gauge which then connects to a second chip below for signal processing and communication with the rest of the ACM electronics.

A small module (Toyota #09H29) containing a sliding mass which shorts out contacts with sufficient deceleration is also present. While we are not certain of its function, it could serve as the first line of impact detection to trigger activity in the balance of the ACM circuitry or perhaps serve as a backup sensor to the MEMS devices.

A Renesas #HD6432695 32-bit CPU w/ Memory monitors the MEMS outputs and performs the algorithmic computations to determine the fire/no-fire threshold and probably select the stage 1 or stage-2 deployment levels based on driver proximity. Most memory for the processor is resident on the Renesas chip and no discrete memory devices other than a small serial EEPROM are present.

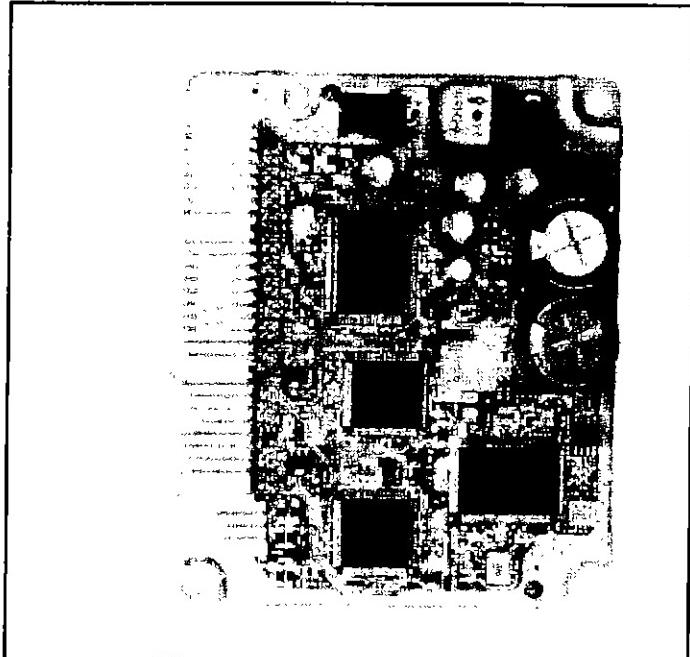
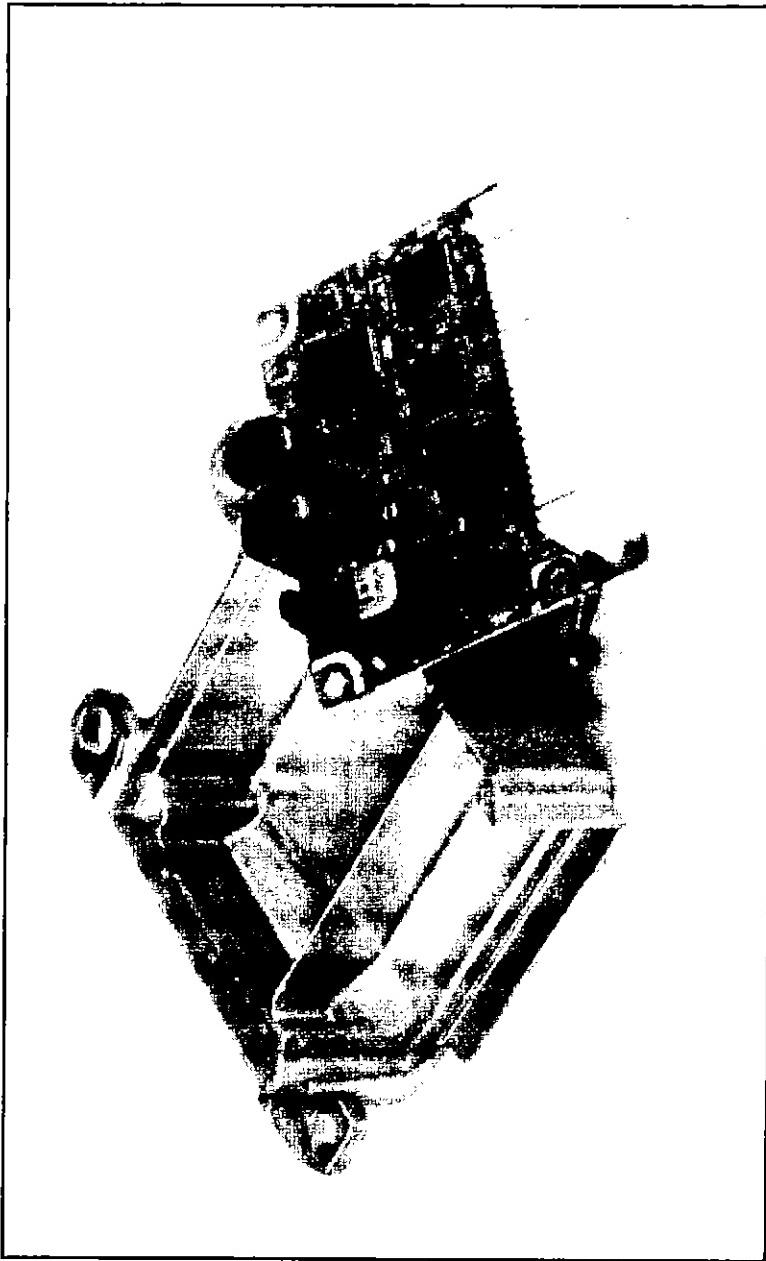
From there it is back to what appears as a more mixed-signal interface with three Denso-custom parts made by STMicro. The #151821-1390 numbered component is duplicated twice, leading to a possible conclusion that one affects the driver-side air bag module and the second the passenger-side airbag. The second Denso/STMicro part (#151821-136) is visually similar to the first pair of parts at the die level, perhaps a slight variation to handle communications control between the ACM and other Prius modules over the car's communication busses. Given the custom nature of the parts, precise details become hard to determine and I'm guessing here - reader input always welcome if you have some other thoughts. There were other airbag sensing modules in the car, probably used for side-curtain functions, so consider this module as only part of the total solution in the fully-optioned Prius variant.

The ACM shown here was housed in yet another of the Prius' many cast metal module housings, using only compliant peripheral-leaded packages and an anti-corrosion varnish. As with many aspect of the Prius' constellation of electronics, the story on conservative design for safety and reliability of critical systems remains the same. In that vein, you will notice the two large electrolytic capacitors on the ACM. These too are probably a redundant safety element to assure enough local power for deployment in case the collision disrupts the SCM's normal 12V source of energy.



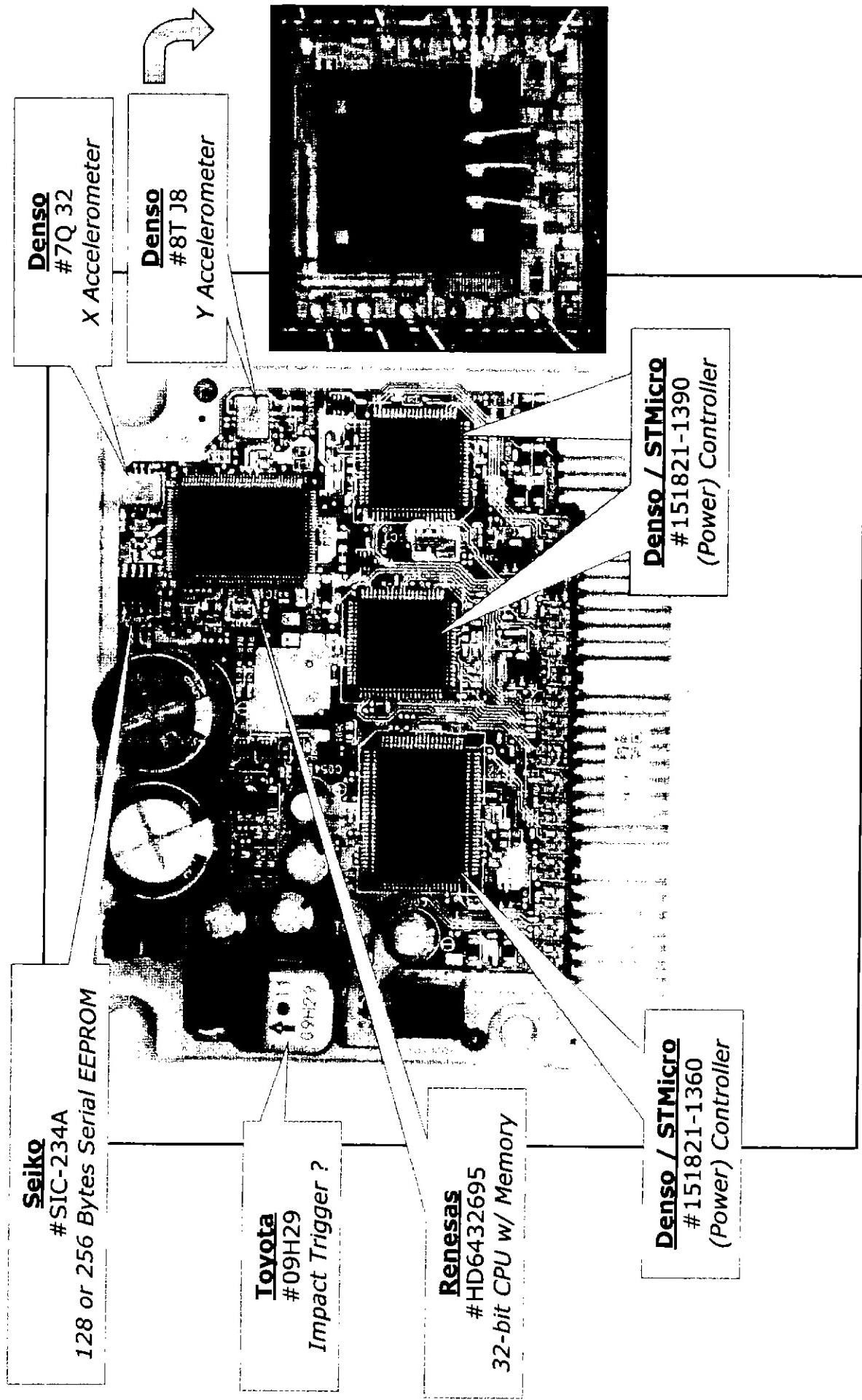
Toyota Prius:

Airbag Control Module (ACM)





Toyota Prius: Airbag Control Module (ACM)



Dash Module



Summary: Dash Module

While much of the vehicles status information and vehicle control functions comes by way of the central touch-screen panel, critical information is delivered from a dedicated display system visible directly behind the steering wheel. The Dash Module (DM) provides most of the output-only information such as speed, fuel-level, selected gear, and odometer/mileage by way of a digital readout and icon-based vacuum fluorescent display (VFD) panel.

Probably supplied here by Futaba or Noritake, the VFD technology has been around for quite some time, and Toyota has elected to shun the analog gauges used years ago and more recently back in fashion in favor of the numeric readout. My first Casio calculator circa 1977 (yes, I took that apart too) used VFDs for their segment-based, high-contrast, high-visibility qualities. Readability and contrast are even more key in the automobile where harsh ambient sunlight might threaten legibility. To further improve visibility the driver actually sees a double-reflected image of the VFD rather than a direct view of the panel. Two mirrors on the underside of the dash direct the output of the VFD to the optical path of the driver, keeping stray light off of the VFD module itself and improving perceived viewing quality.

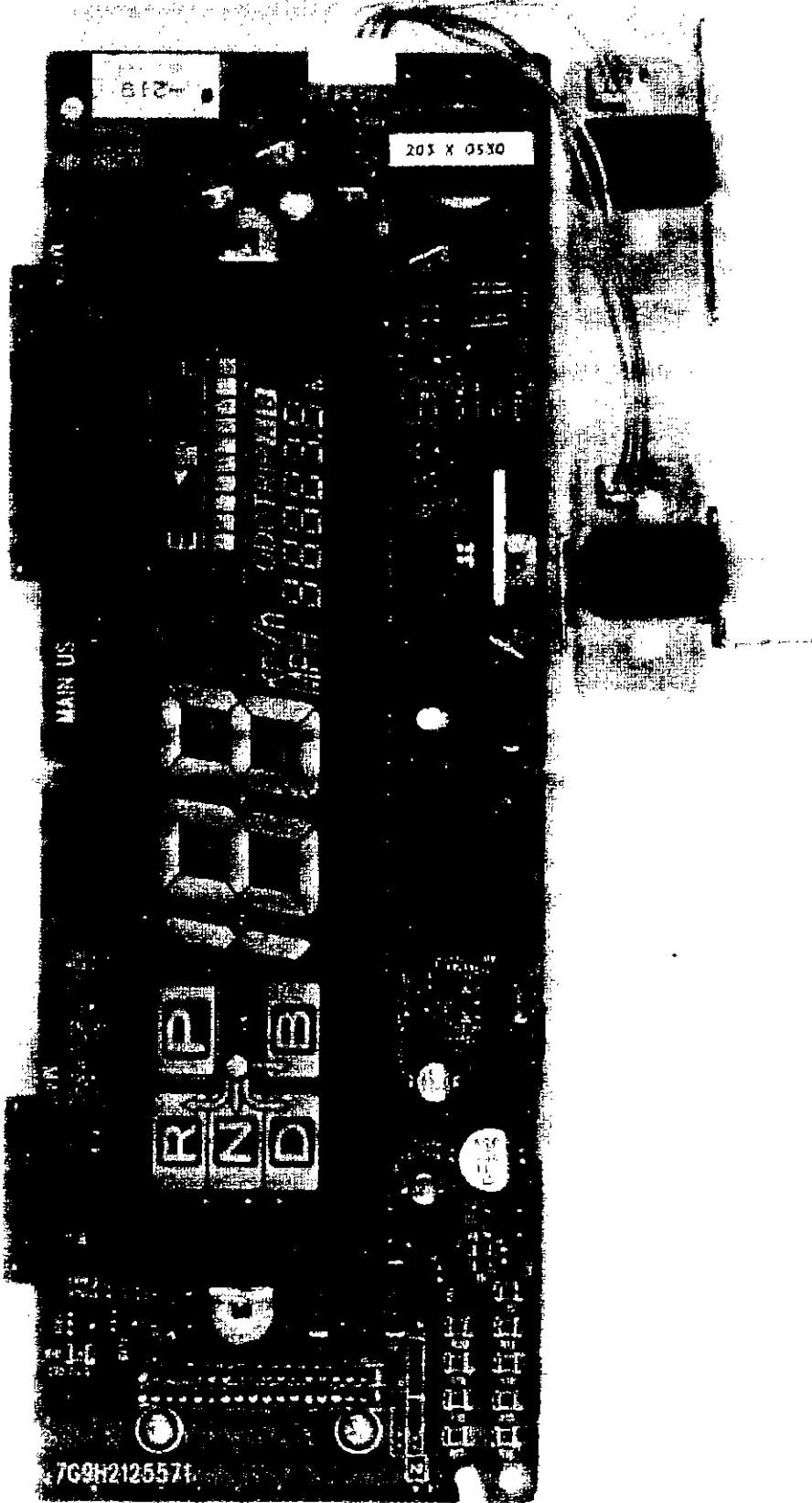
While not particularly high-current, the VFD does require high voltage, and an Oki Semiconductor #MSC1162A 40-bit VFD Display Driver translates output of the lone Fujitsu #MB90583C 16-Bit Microcontroller to the appropriate levels for achieving fluorescence from the driven electrodes of sealed vacuum chamber of the panel.

A 5-volt regulator, mystery Toshiba chip (clock?), and serial EEPROM are the primary remaining ICs on the DM board. Along with display control, the Fujitsu microprocessor forms the communications interface back to the gear-position sensor and engine control module. It is unclear whether speed and mileage information is calculated and stored within the DM itself or whether the DM serves strictly as a "dumb" display of information determined elsewhere in the Prius.

Two white modules connect into the DM as well, and here again a bit of "Huh?" factor set in. When opened up, the modules revealed an oil-damped V-shaped pendulum inside with the ends of the pendulum arms holding a magnet which swings overtop a Hall-effect sensor. My first thought was that these may form the Yaw sensors mentioned earlier in the context of the Skid Control Module, but the slow damping would tend to rule that out. Perhaps a more likely use given their construction, tie-in to the DM circuits, and their orthogonal arrangement when mounted is a tilt sensor for compensating displayed fuel level. When parked at an angle in one or both the axes of the car, the sensors might be used to recalibrate displayed fuel level so that accurate tank readings are possible even when gas in the tank is piled up away from the in-tank level gauge. Again, with the complexity of the car it all gets a bit hard to sort out sometimes.



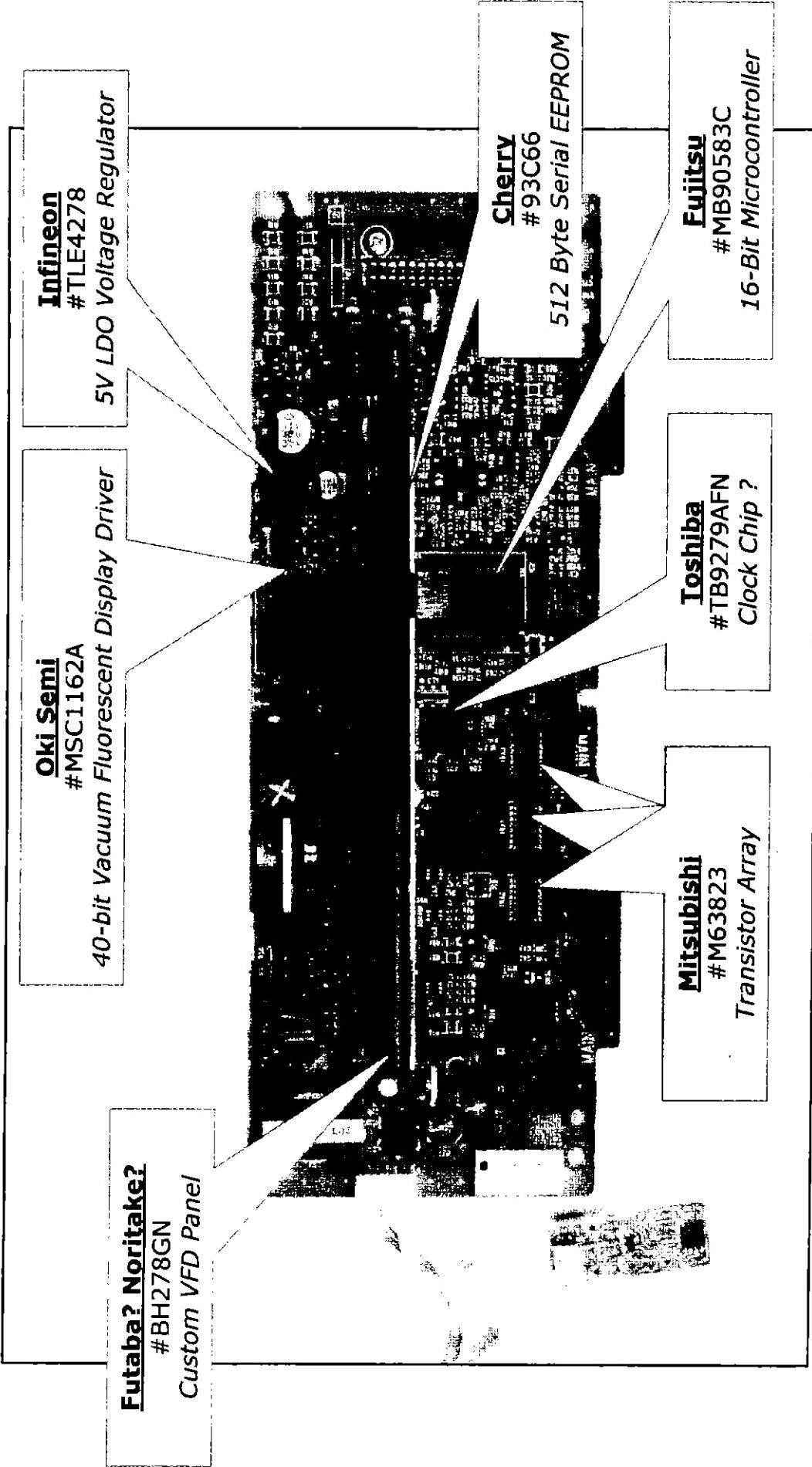
Toyota Prius: Dash Module (DM)



What you see from behind the wheel.....

Toyota Prius:

Dash Module (DM)



Mostly a display and display alone - limited direct input.



Portelligent Summary: User Interface & Navigation

With increasing frequency, car buyers are coming to spend big for the convenience of in-car navigation. Not unusual for factory-optioned navigation, the Prius' GPS-based mapping and guidance system adds almost \$US2000 to the total Prius sticker-price. As a practical matter, what the driver perceives as the navigation "system" is really a composition of two distinct sub-systems, one the GPS navigation unit itself and the other a visual interface by which the driver can see and interact with mapping functions.

The Prius' visual user interface (VUI) comes by way of a Toshiba liquid crystal display (LCD) and associated electronics located mid-dash. The touch-screen LCD panel is an important and standard part of any Prius bought today (it's present even if the navigation option is not chosen), serving as the interface for energy monitoring, climate control, and car audio. Like a general trend in cars (and aircraft) today, much of the traditional gauge and button UI is migrating to a centralized "glass cockpit" and the Prius is no exception.

Within the VUI, communication with the ECM, HVECU, and other convenience control subsystems occurs, allowing the touch panel to serve many roles depending on the selected use mode chosen by way of select buttons to either side of the LCD. While speed, gear, fuel-level, and odometer functions are delivered via a vacuum-fluorescent display Dash Module (DM) assembly just discussed, the bulk of interaction in the Prius comes through the VUI. A pair of components based on the multi-OS capable "Naviem" partnership between Denso and Toshiba creates the master graphical display and control interface. 32MB of NOR flash from Sharp and 64MB of DDR SDRAM from Elpida join with the Naviem devices to create what can be considered the general-purpose compute system responsible for touch-screen LCD and monitoring/command I/O. The VUI box is cooled by a pair of fans, hinting at the relative processor horsepower within.

Pony up the extra money for navigation unit (NU), and the MAP/Voice and DEST mode buttons become active alongside the standard VUI mode selects. With the navigation option, a new box housing the navigation-specific electronics and accompanying DVD-ROM drive for map data gets installed under the driver's seat at build-time. The factory navigation unit supports not just mapping information however. Voice recognition allows hands-free address and navigation command entry and voice prompts – like many commercial GPS units – provide spoken driving directions among other functions.

The navigation subsystem is standalone other than the lack of the visual interface. To complete the connection to the VUI for visual aspects of operation, a Sony Gigabit Video Interface transmitter (#CXB1457R) pipes data up to the VUI for display. A corresponding Sony #CXB1458R Gigabit Video Interface Receiver is found within the VUI box to bring in navigation unit information for display. Map data is available by way of a Panasonic-manufactured DVD-ROM drive housed within the NU enclosure.

A GPS antenna installed under the dash cover is positioned to allow line-of-sight to GPS satellites through the front windshield, and a coax cable then snakes its way back to the underseat navigation box. The RF front end for GPS is a quite-small portion of the navigation electronics, based here on a Panasonic #AN18401A down-converter to get to a de-modulated GPS input signal. From there, a sizable Renesas #HD6473810 processor is responsible for all of the GPS baseband work needed to calculate present position for joining with local mapping data. But GPS data-crunching is only part of the required processor function since all of the voice recognition and voice prompting is also done in the NU and it is here that the processor demands rise beyond GPS alone.

Within the NU, 96MB of total DDR SDRAM is found spread across three 32MB Elpida chips and 1MB of Spansion NOR flash serves for local code store. It's worth noting that both the NU and VUI which use sizable stores of discrete memory versus the much smaller embedded/on-chip memory of other processor subsystems. Likewise IC packaging steps up to high pin-count BGA devices over the QFP packaging found in the more conservatively-designed modules such as ECM, HVECU, and ICU assemblies discussed elsewhere.

A mix of cabin-internal use environments, more modern design, and less-mission-critical attributes for the NU and VUI probably contribute to the latter's closer engineering resemblance to traditional consumer electronics. It is here in the Infotainment area where we indeed see much of the growth in automotive electronics and convergence with the gadgetry we're more accustomed to seeing outside the car.

Visual User Interface (VUI)



Toyota Prius:

Visual User Interface (VUI)

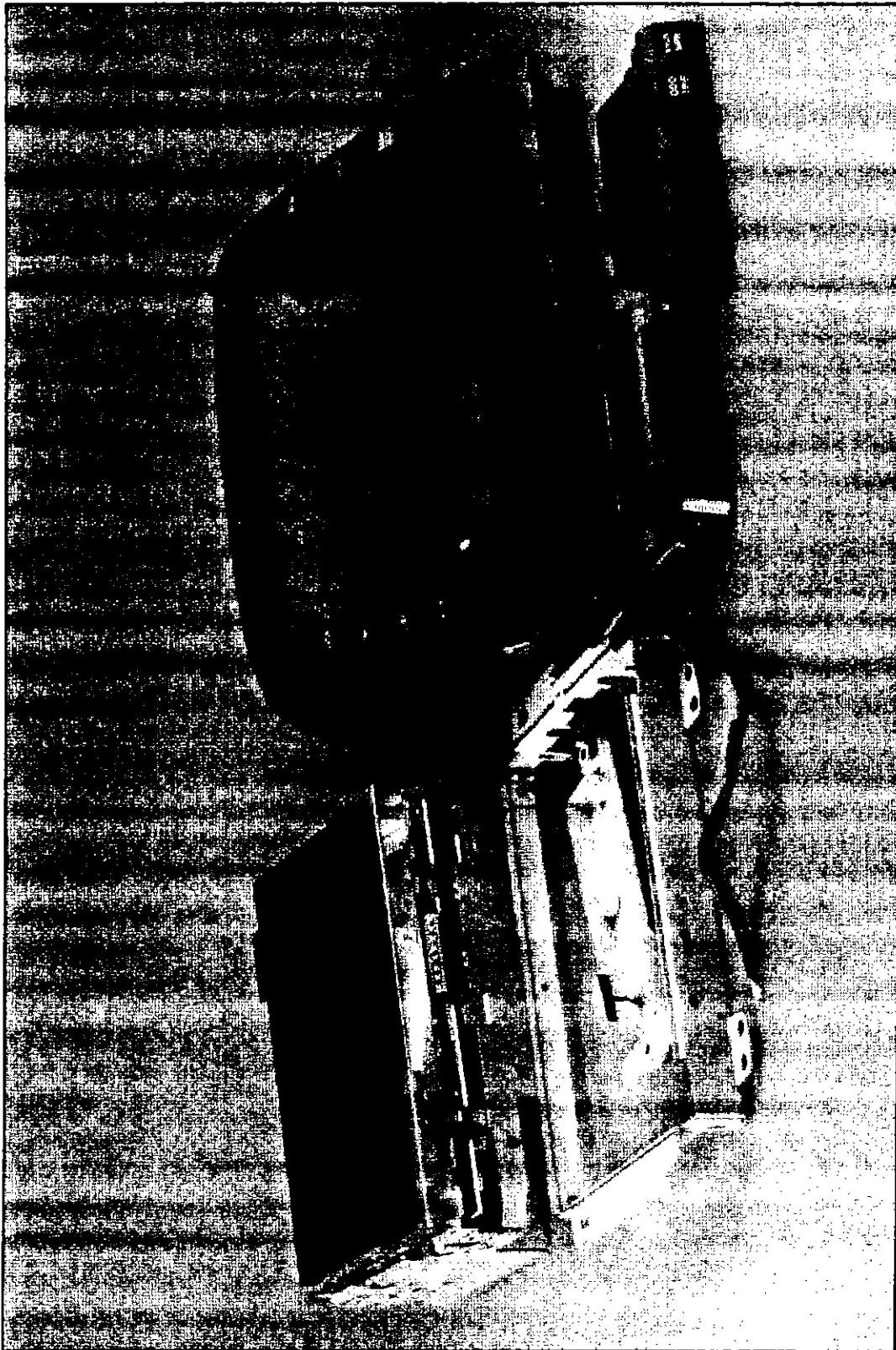


The central touch-screen interface for Nav, Trip Computer, Audio, Maintenance, Power Train Status, Climate Control / HVAC



Toyota Prius:

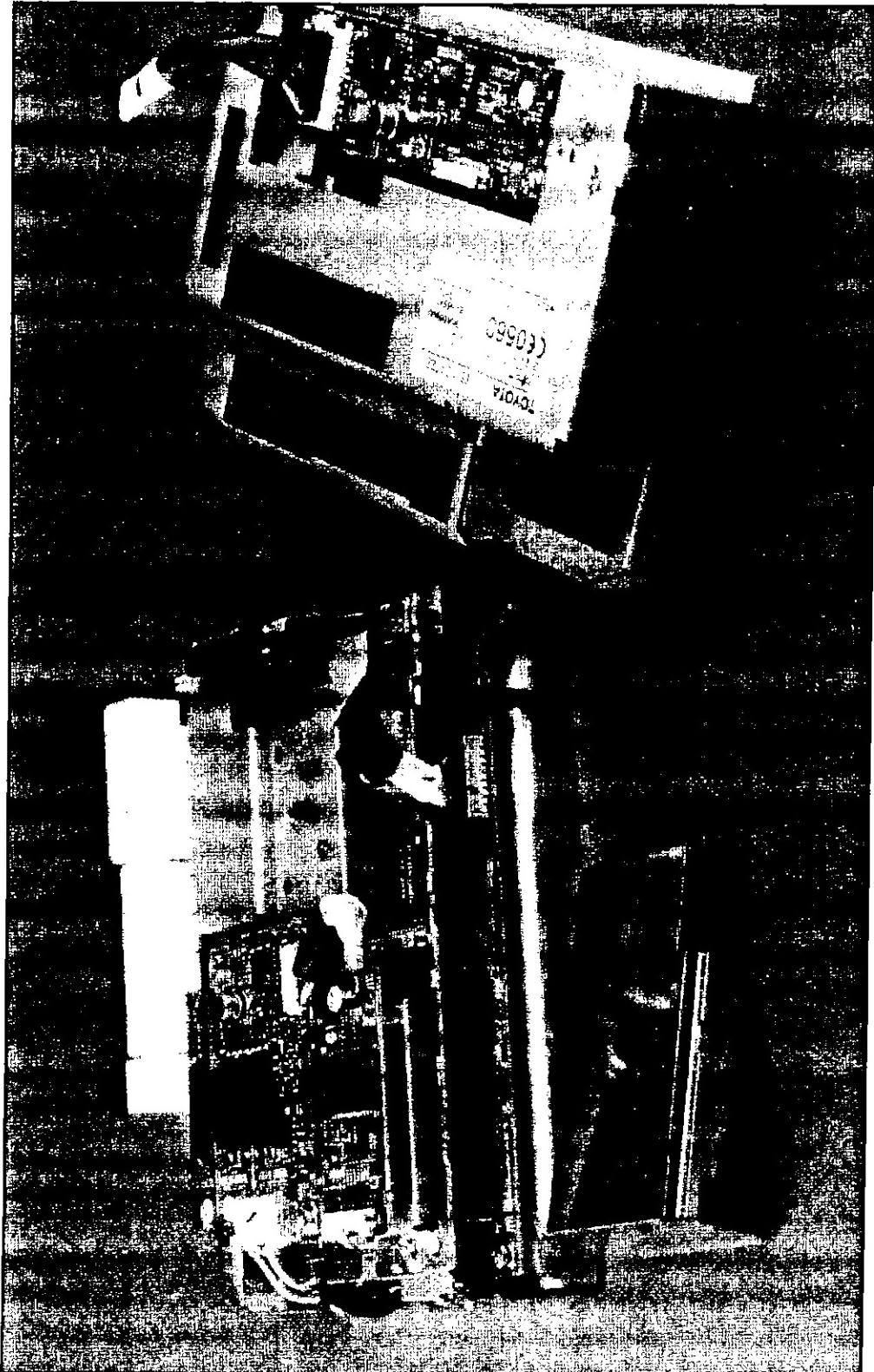
Visual User Interface (VUI)



Switch Module, Clock Module separate from the core display/processor assembly.



Toyota Prius: *Visual User Interface (VUI)*

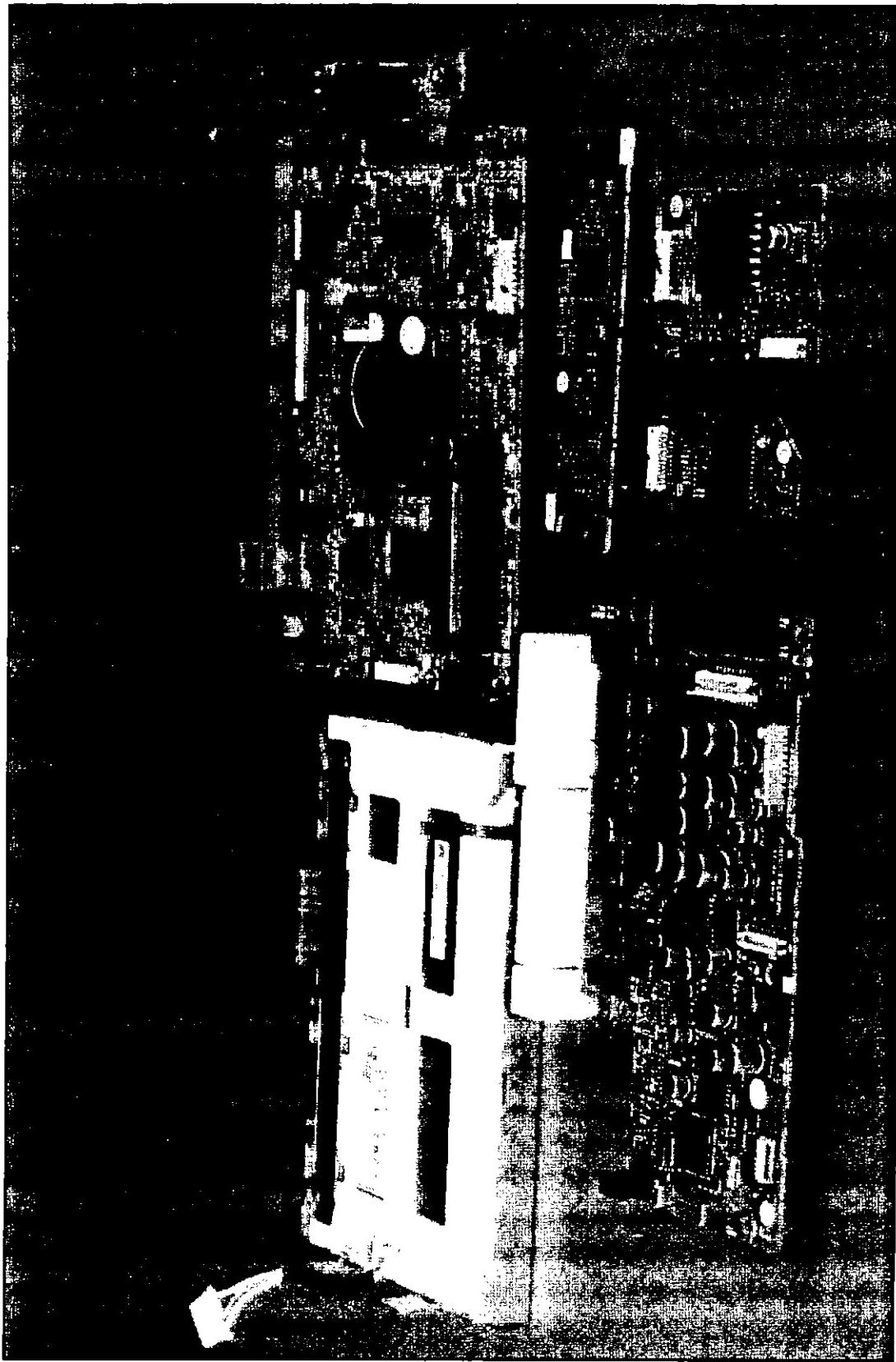


Lots of mechanical chassis to bring together multiple PCB assemblies and LCD panel.



Toyota Prius:

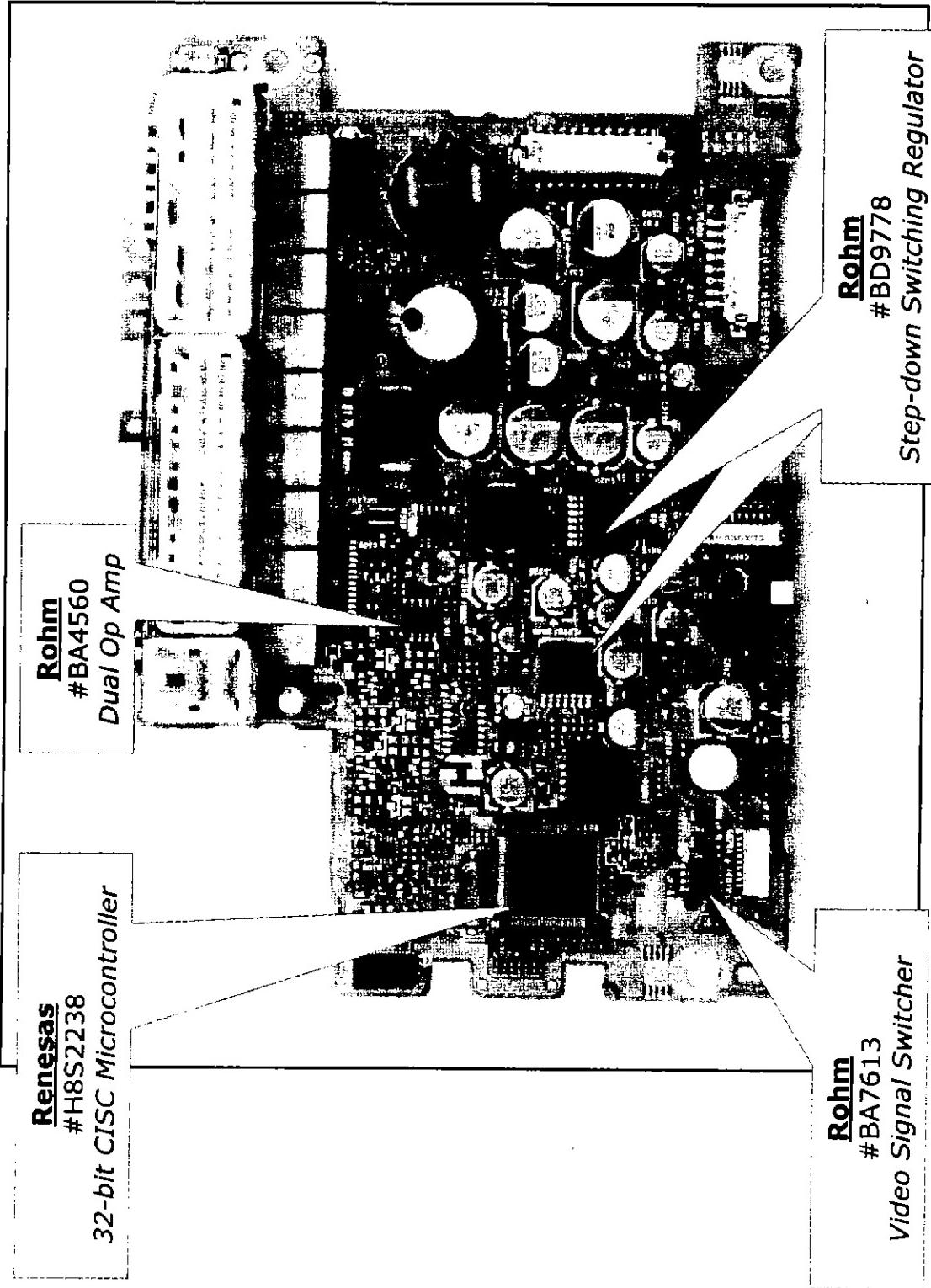
Visual User Interface (VUI)





Toyota Prius:

Visual User Interface (VUI)

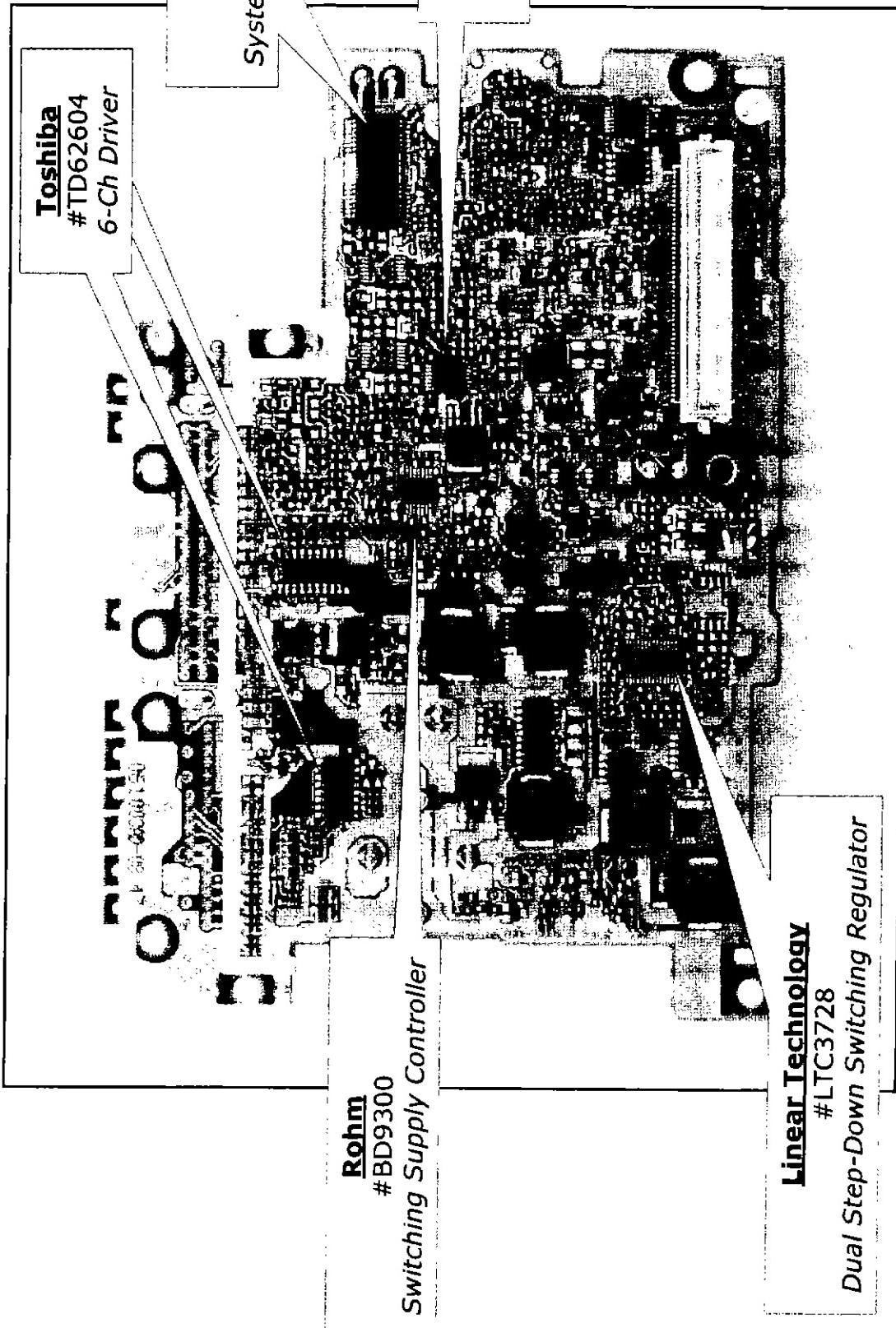


I/O controller and DC-DC conversion here along with Nav Unit Input



Toyota Prius:

Visual User Interface (VUI)

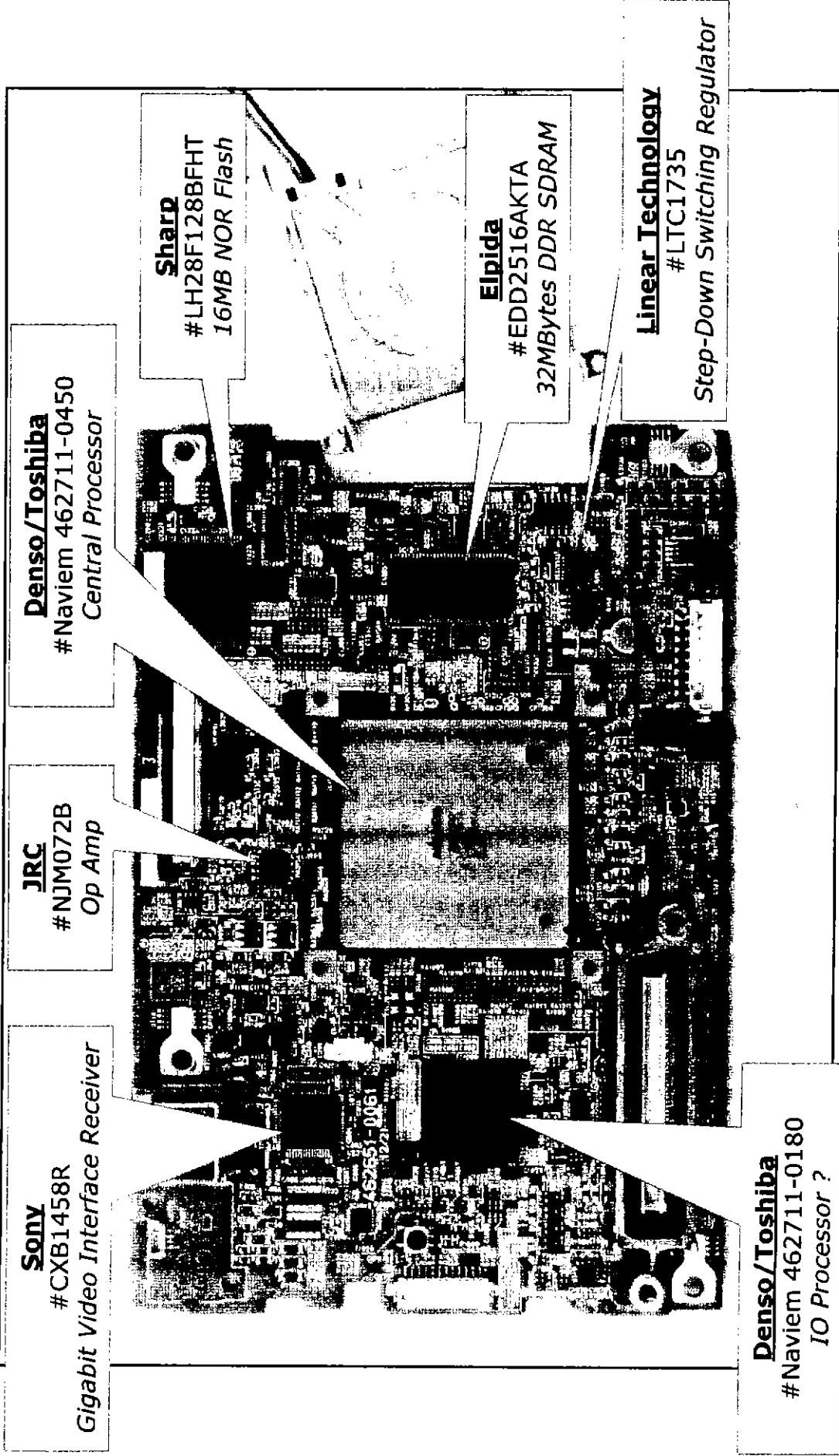


LOTS of power management on the back side.



Toyota Prius:

Visual User Interface (VUI)



The meat of the Information Computer is based on
Toshiba/Denso partnership and "Naviem" OS/Hardware.



Toyota Prius: VUT – Naviem Background

DENSO, Toshiba develop world's first multi-OS for vehicle navigation systems

Date: 12/10/2003

Supports both µITRON and Microsoft® Windows® Automotive

TOKYO and KARIYA CITY, Japan—Toshiba Corporation and DENSO Corporation, a leading supplier of advanced automotive systems, including car navigation systems, today announced joint development of the world's first multi-OS (operating system) environment (software) for car navigation systems.

The multi-OS environment provides single-chip support for both µITRON, the operating system for embedded devices, and Microsoft® Windows® Automotive, enabling the use of advanced automotive systems, provided by µITRON, and multi-media applications such as the Internet, provided by Microsoft® Windows® Automotive concurrently.

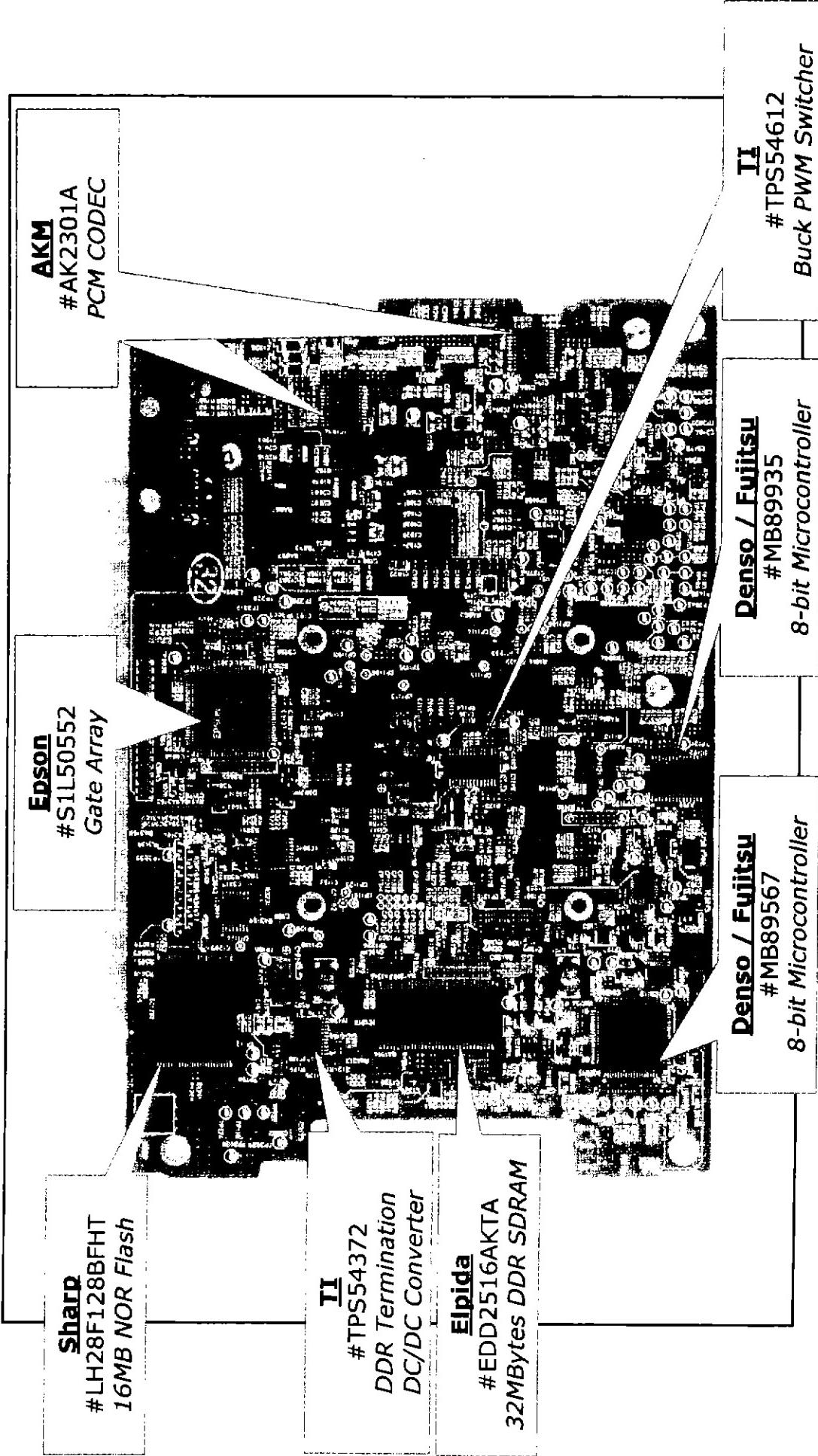
The multi-OS environment can be applied to the SoC (system on chip), “NAVIEM”, which is used for DENSO car navigation systems. “NAVIEM”, which was jointly developed by DENSO and Toshiba, features Toshiba’s TX49 embedded CPU.

The TX49 core, based on the RISC architecture developed by **MIPS Technologies, Inc.**, provides full support for SoC, assuring the flexibility required for integration of diverse applications and the scalability required for the integration of wide-ranging functionality. As a result, “NAVIEM” provides automotive design engineers with the freedom and ability to address diverse requirements with a single-chip solution.



Toyota Prius:

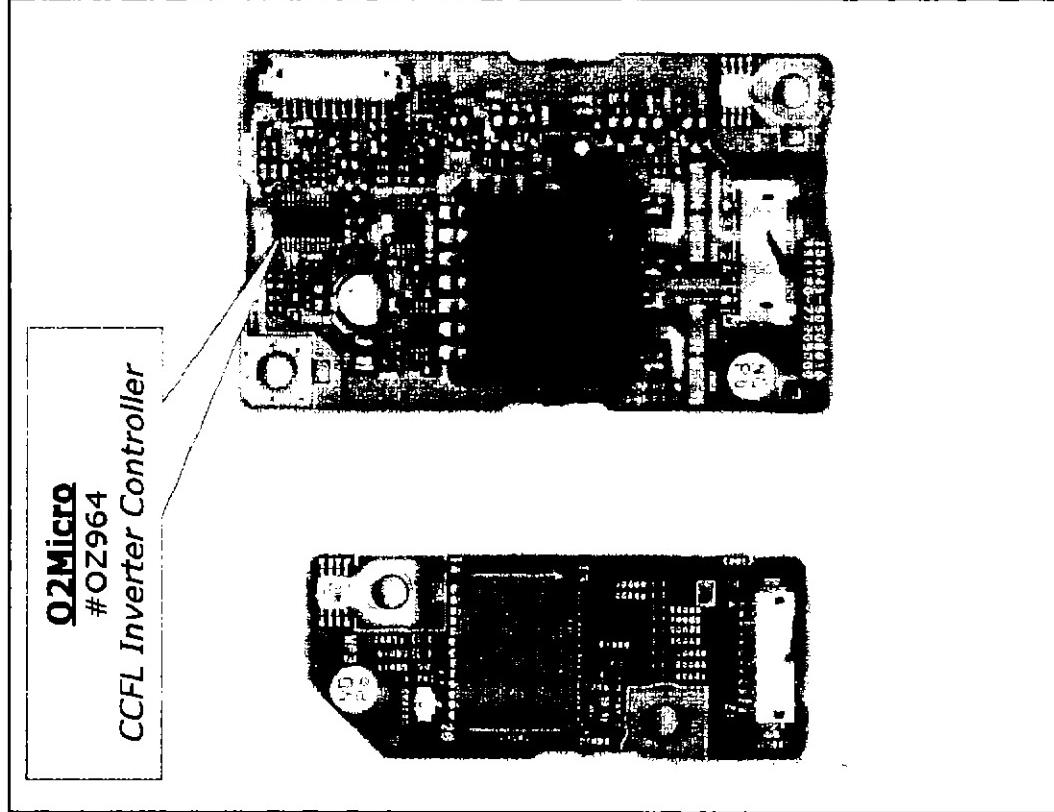
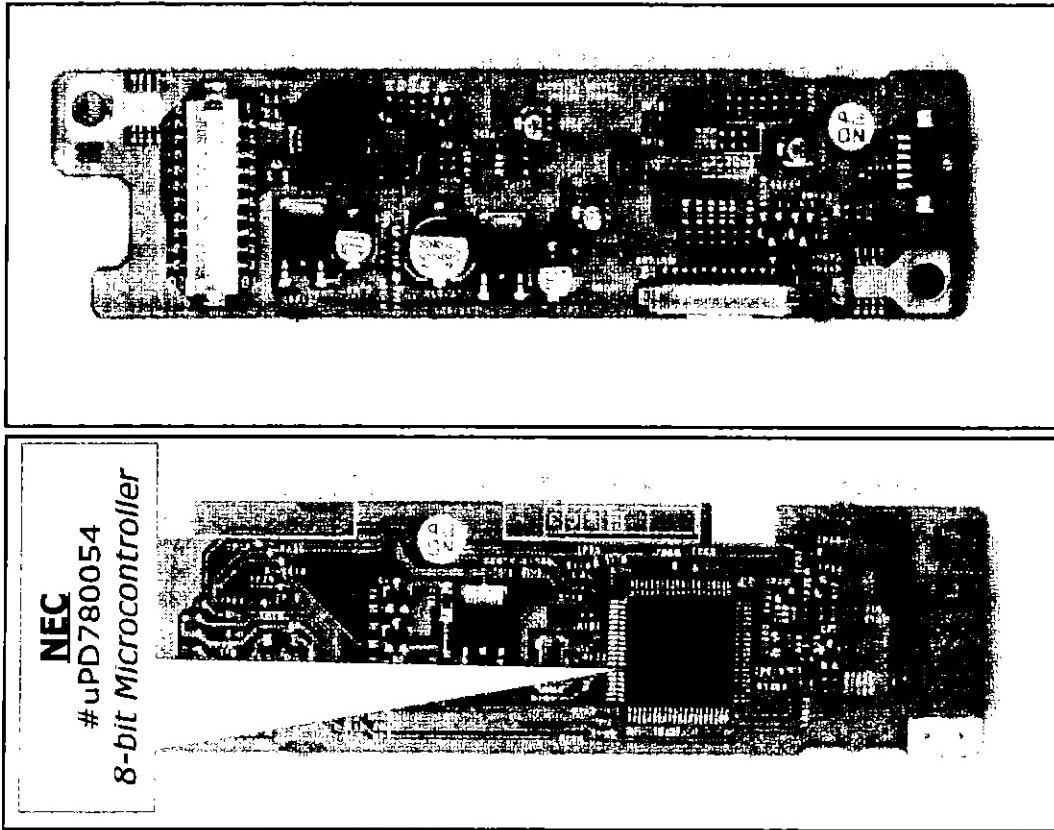
Visual User Interface (VUI)



Audio Input CODECs, couple of controllers, additional memory and Gate Array interface to LCD are on the back side.



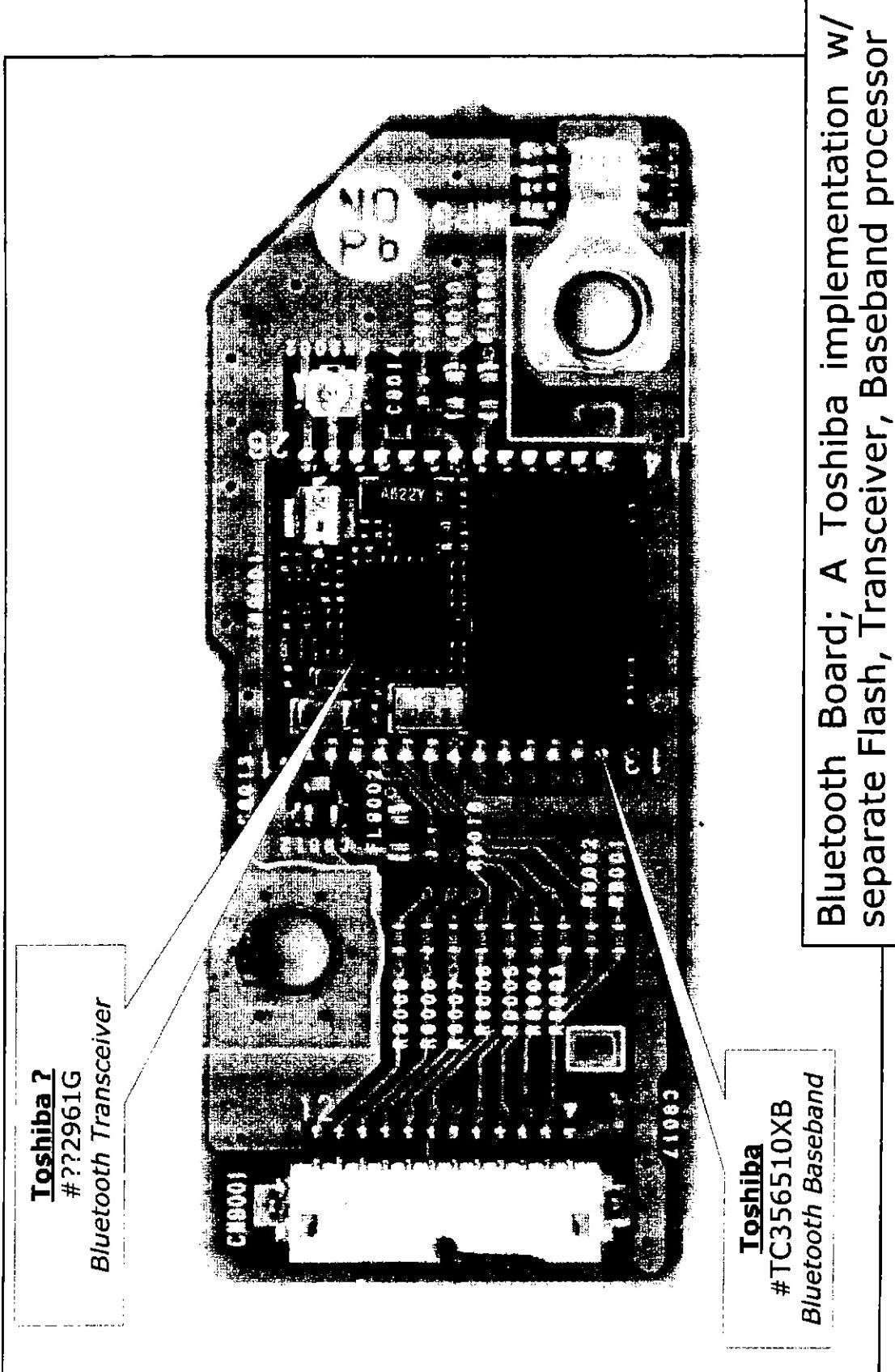
Toyota Prius: Visual User Interface (VUI)



More controllers, power management, and CCFL inverter for LCD backlight.



Toyota Prius: Visual User Interface (VUI)



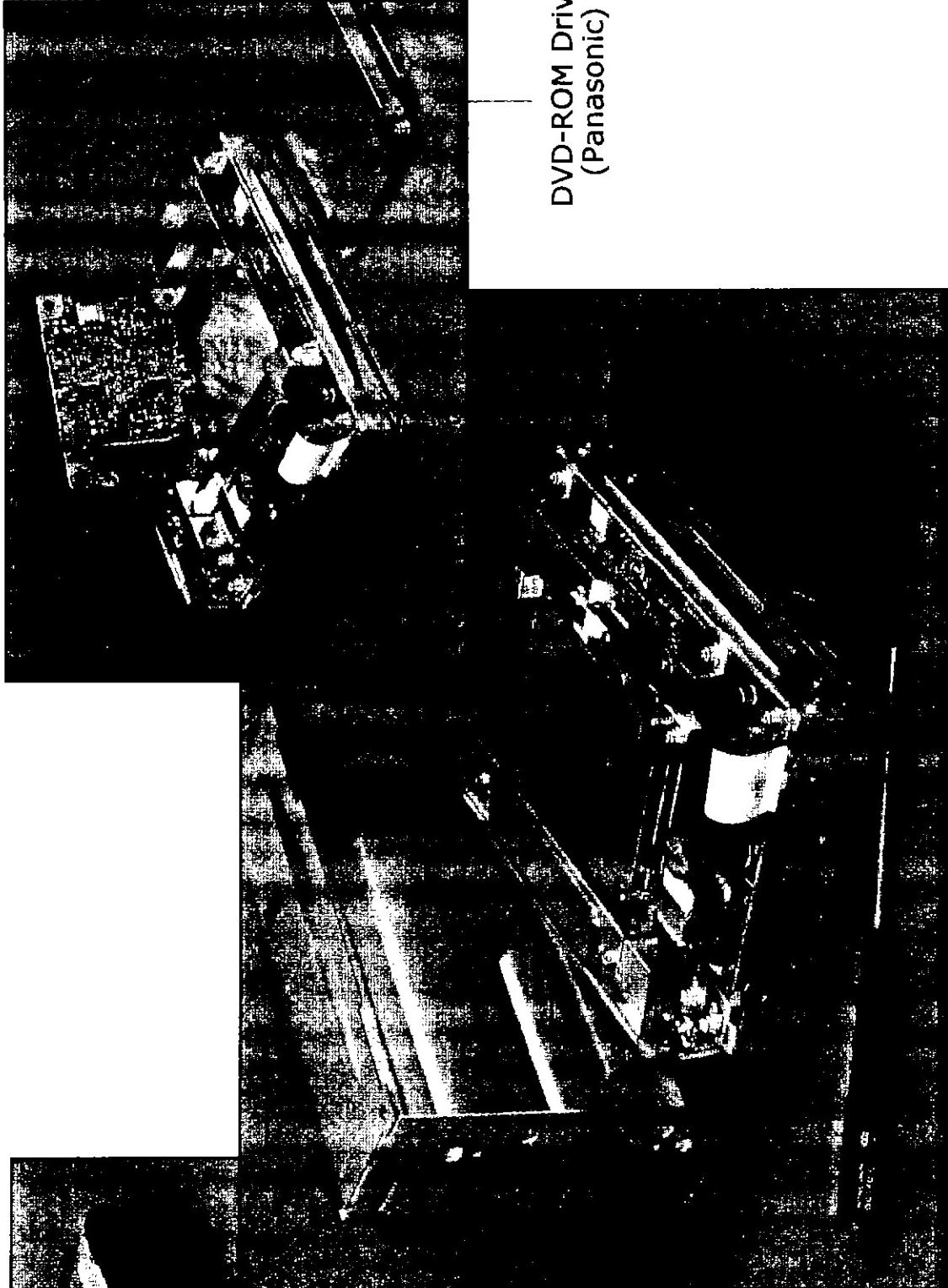
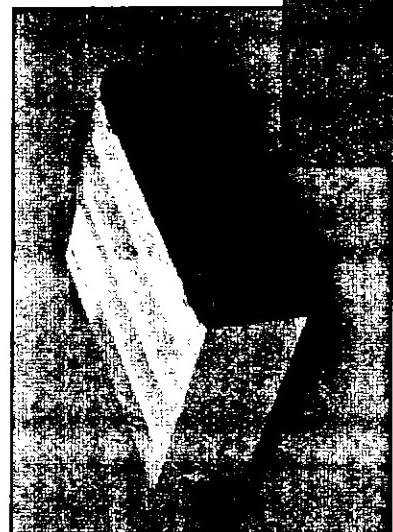
Toshiba
#TC356510XB
Bluetooth Baseband

Toshiba
#??2961G
Bluetooth Transceiver

Navigation Unit (NU)



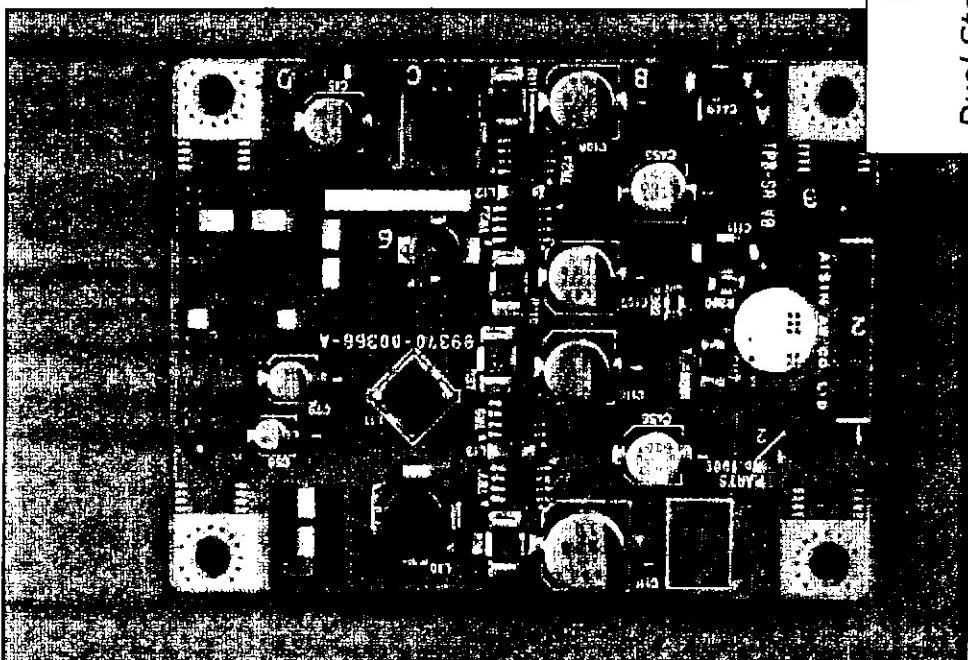
Toyota Prius: Navigation Unit (NU)



DVD-ROM Drive
(Panasonic)

Portelliqent

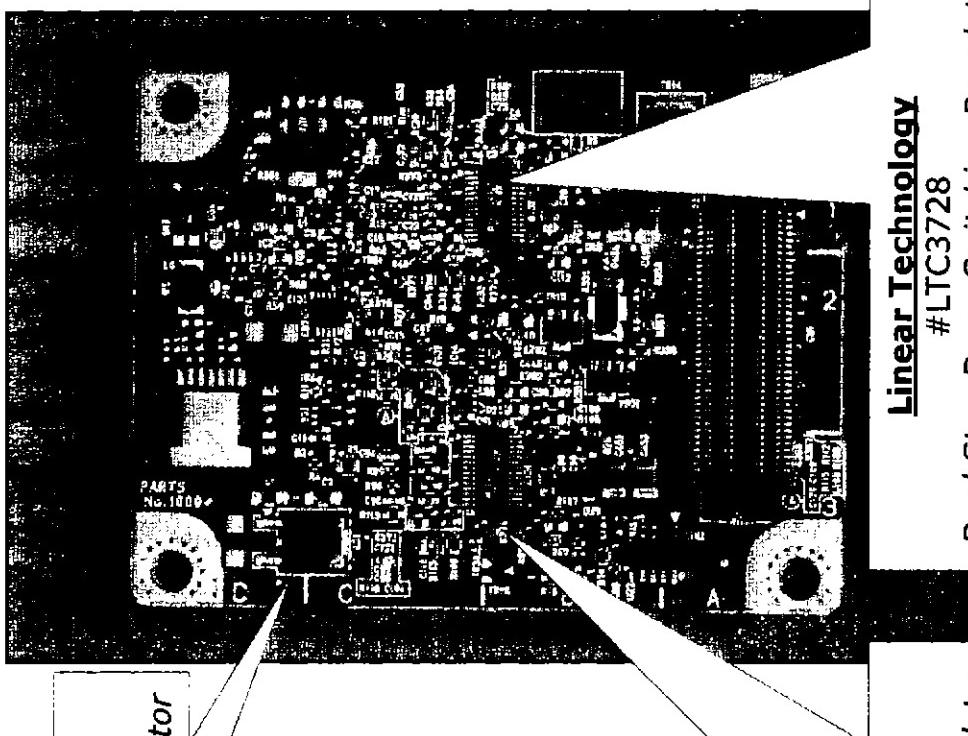
Toyota Prius: *Navigation Unit (NU)*



Panasonic
#AN709
9V / 1.2A LDO Reg.



Panasonic
#AN7709
9V / 1.2A LDO Regulator



Linear Technology
#LTC3728
Dual Step-Down Switching Regulators

#LTC3728

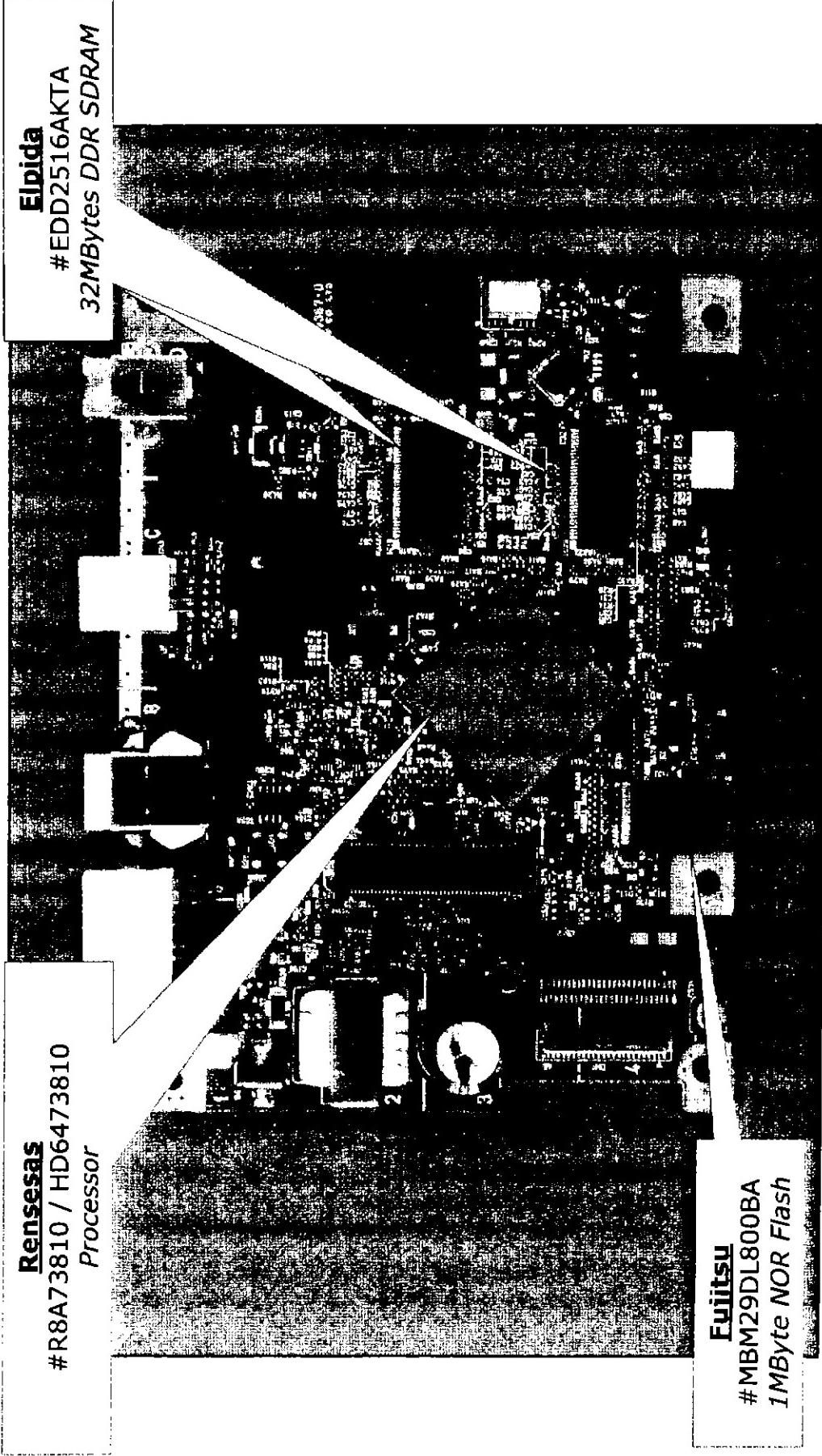
Dual Step-Down Switching Regulator

Linear Technology

#LTC3728



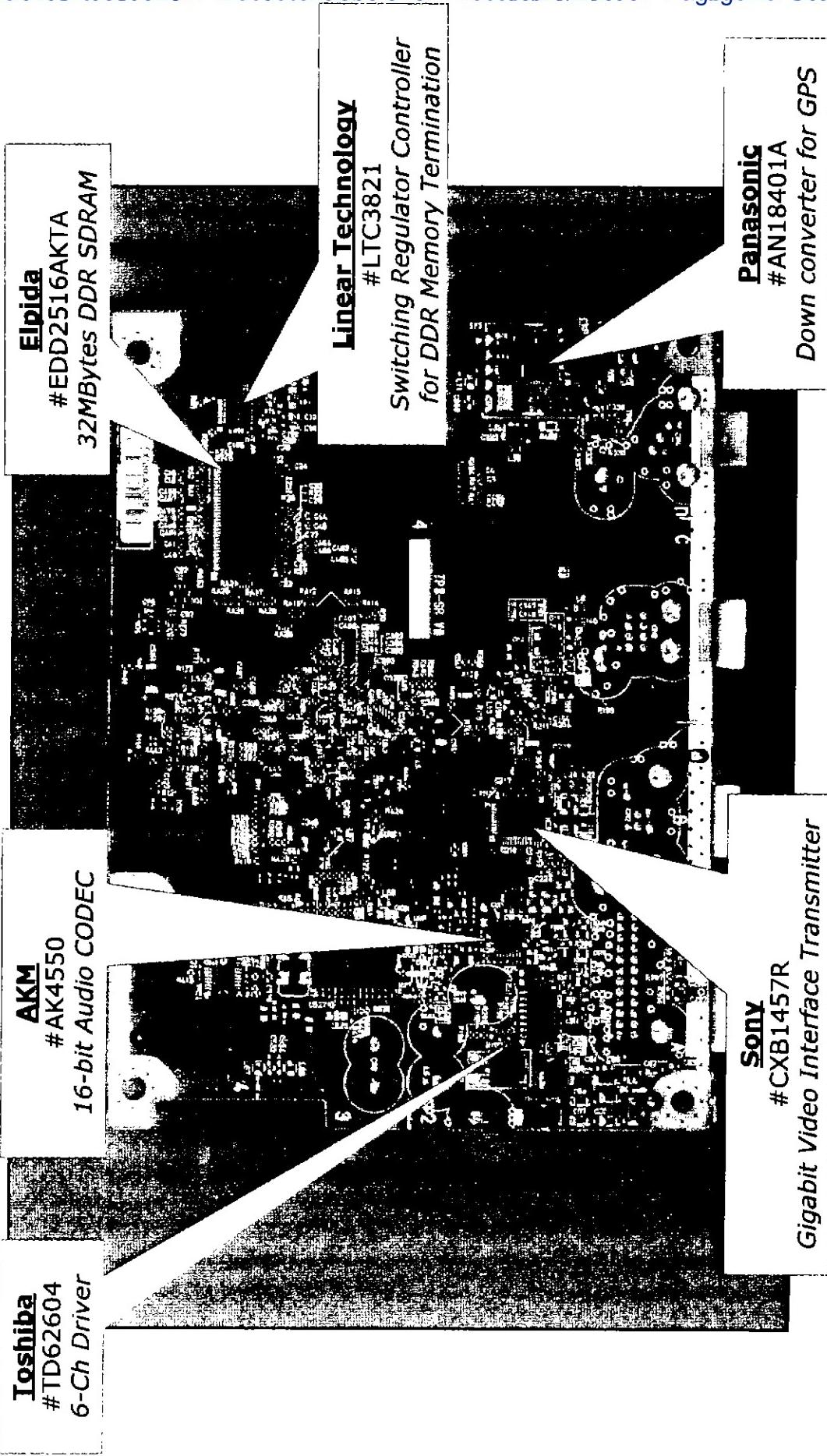
Toyota Prius: Navigation Unit (NU)



Renesas processor forms the heart of the GPS unit.



Toyota Prius: Navigation Unit (NU)



Gigabit Video Interface used in "visual communications" with central VUI LCD assembly.

EXHIBIT “U”

1 TEKER TORRES & TEKER, P.C.
2 130 Asinall Avenue-Suite 2A
3 Hagatna, Guam 96910
4 671.477.9891 Telephone
5 671.472.2601 Facsimile

6 UNPINGCO & ASSOCIATES, LLC
7 Sinajana Mall-Suite 12B
8 Sinajana, Guam
9 671.475.8545 Telephone
10 671.475.8550 Facsimile

11 SHORE CHAN BRAGALONE LLP
12 Suite 4450
13 325 N. St. Paul Street
14 Dallas, Texas 75201
15 (214) 593-9110 Telephone
16 (214) 593-9111 Facsimile

17 ATTORNEYS FOR PLAINTIFFS
18 Nanya Technology Corp. and
19 Nanya Technology Corp. U.S.A.

20
21 NANYA TECHNOLOGY CORP. AND
22 NANYA TECHNOLOGY CORP. U.S.A.,

23 v.
24 Plaintiffs,

25 FUJITSU LIMITED AND FUJITSU
26 MICROELECTRONICS AMERICA, INC.,

27 Defendants.

28 Case No. CV-06-00025

29
30 DECLARATION OF
31 STEVEN L. AGUON
32 IN SUPPORT OF
33 PLAINTIFFS' SUR-REPLY

34
35 I, Steven L. Aguon, declare the following:

36 1. That I am over the age of eighteen and competent to make this declaration.

1 2. That I am employed by the Government of Guam, Department of Revenue & Taxation,
 2 Motor Vehicle Division as the Vehicle Registration Branch Supervisor. I have been employed with
 3 Division for eighteen (18) years.

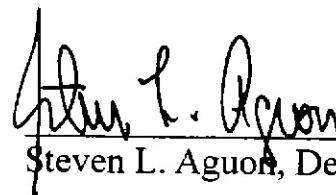
4 3. On June 25, 2007, I ran a data search of the Division's computer records regarding the
 5 number of Toyota Prius vehicles currently registered on Guam. The results of the search showed that
 6 there are seventy-two (72) such vehicles currently registered with the Division which include model
 7 years 2001 through 2007.

8 4. The number of new registrations for the years 2000 through 2007 are as follows:

<u>Year Registered</u>	<u>Total No. Registered</u>
2000	1
2001	5
2002	1
2003	4
2004	16
2005	22
2006	13
2007	10

21 I declare under penalty of perjury that the foregoing is true and correct and to the best of my
 22 knowledge and belief.

23 Dated this 26th day of June, 2007.



24
 25 Steven L. Aguon, Declarant
 26
 27
 28